Final Decision Documentation and Decision Rationale

South Willie Timber Sale

Environmental Assessment Number: OR080-2001-02

USDI – Bureau of Land Management
Oregon State Office, Salem District, Marys Peak Resource Area
Sections 6 and 7, Township 15 South, Range 6 West, and Section 12, Township 15 South, Range 7 West, Willamette Meridian, Benton County, Oregon.

I. Background

Starting in 1999 and through 2003 an IDT (interdisciplinary team) analyzed approximately 360 acres managed by the Marys Peak Resource Area, Salem District Bureau of Land Management (BLM) for a timber harvest proposal. The stands analyzed are located within the Upper Alsea River fifth-field watershed. An environmental analysis was conducted and documented in the Environmental Assessment South Willie Timber Sale (EA) Number OR080-2001-02. Approximately 160 acres were dropped from further analysis at various stages in the process. The EA documented three proposed projects under Alternative A, the Proposed Action. Project 1 proposes to perform density management harvest on approximately 199 acres within General Forest Management Area and Riparian Reserve Land Use Allocations (LUA). This project also includes increasing tree diameter growth to achieve future potential coarse woody debris and instream large wood sources in the Riparian Reserves. Road construction, reconstruction and improvement are also a part of the project. Project 2 proposes to girdle trees for snag creation and fell trees to meet coarse woody debris objectives in the Riparian Reserves. The third project proposes to hand-fall individual trees into a perennial stream to enhance stream habitat. A Finding of No Significant Impact (FONSI) was signed on November 26, 2003 and the EA and FONSI were made available for public review on December 1, 2003.

II. Decision

Based on site-specific analysis in the Environmental Assessment, the supporting project record, management recommendations contained in the South Fork Alsea Watershed Analysis dated November 1995, as well as the management direction contained in the Salem District Resource Management Plan (RMP) dated May 1995, I have decided to implement the Alternative A (Proposed Action) as described in the Environmental Assessment South Willie Timber Sale (EA# OR080-2001-02).

The following is a summary of this decision.

1. Harvest from approximately 157 acres of General Forest Management Area (Matrix) and approximately 42 acres of Riparian Reserve land use allocations for an expected

yield of 6,740 hundred cubic feet (CCF), 3,683 MBF. Approximately 133 acres will be skyline yarded and 66 acres will be ground-based yarded, from 12 silvicultural units.

2. Approximately 4,745 feet of new road will be constructed, 4,045 feet of road will be reconstructed, and 9,435 feet of road will be improved/renovated (brushing, blading, spot rocking, install/repair drainage structures, minimal excavation). Approximately 15,740 feet of road will be blocked to public vehicular use following project completion.

3. Approximately 3 years following harvest, the size and condition of CWD and snags within Riparian Reserves will be evaluated. If determined necessary to meet management objectives, snags and/or down wood will be created within Riparian Reserves by girdling and hand-falling of individual trees.

4. Approximately 4 trees per 1000 feet of stream will be cut and left in place to use as instream structures in a fish-bearing stream on the northern boundary of the project area.

5. Compliance with Direction

The selected action is consistent with applicable land use plans, policies, and programs:

a. Programmatic documents covering this proposal are:

Salem District Record of Decision and Resource Management Plan (RMP 1995);
Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents Within the Range of the Northern Spotted Owl and Standards and Guidelines for Management of Habitat for Late Successional and Old Growth Related Species Within the Range of the Northern Spotted Owl (April 1994);
*Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Other Mitigation Measures Standards and Guidelines (*ROD, January, 2001*); Implementation of 2002 Survey and Manage Annual Species Review (*June 2003*); Endangered Species Act Section 7 Formal consultation and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for U.S. Forest Service and Bureau of Land Management Programmatic Activities in Northwestern Oregon, (Feb 25, 2003).*

All of these documents are available for review at the BLM Salem District Office.

b. Monitoring activities related to this sale will be done as described in Appendix J of the RMP (May 1995).

III. Decision Rationale

Considering public comment, the content of the EA and supporting project record, the management recommendations contained in the South Fork Alsea Watershed Analysis, and the management direction contained in the RMP, I have decided to implement the selected action as described above. My rationale for this decision follows.

The selected action addresses the identified purposed and need for the action in that it will:

a. supply timber that will help maintain the stability of local and regional economies;
b. provide for the retention of important ecological components within the forest management area;
c. concentrate the sites' productivity on fewer stems, resulting in a higher quality end product, healthier forest, and removal of trees which would otherwise die before final harvest;
d. accelerate diameter growth, maintain crown ratios, encourage the development of a second canopy layer, and maintain species diversity in uplands and Riparian Reserves;
e. reduce the spread of dwarf mistletoe to uninfected stands;
f. create snags and terrestrial large diameter down wood for wildlife and ecosystem complexity;
g. provide instream large woody debris to improve aquatic habitat;
h. accomplish road restoration and riparian enhancement in a manner that meets the Aquatic Conservation Strategy Objectives outlined in the RMP (pgs. 5-6).

The Alternative B (No Action) and alternatives which were considered but eliminated from further consideration during the development of the proposed action did not meet the objectives of the purpose and need as described above. The No Action alternative would allow for natural succession to shape forest characteristics and would not provide for a sustainable supply of timber and/or would reduce timber quality for future harvest. Trees would continue at their present rate of growth, slowing as the canopy closes and competition for light becomes more intense. As the canopy closes, little light would reach the forest floor inhibiting understory development. Crown ratios would decrease at a faster rate and wind firmness and individual tree stability would decrease as crown ratios decrease. Stand mortality due to competition would increase, creating larger amounts of small CWD and snags. However, trees that would die from natural succession and competition would be of smaller average diameter, providing less durable wood for terrestrial and aquatic habitat.

Because mistletoe infection in western hemlock would continue unchecked, western hemlock in the northern end of the project area could become infected and continue to spread the disease to adjacent merchantable stands. Also under the No Action alternative, road drainage improvements would not occur and ditchlines would continue to direct road sediment and runoff directly into project area streams.

IV. Public Involvement / Consultation / Coordination

1. Scoping

A description of the proposal was included in the Salem Bureau of Land Management *Project Update* issues from December 2000-January 2003, which was mailed to more than

1200 individuals and organizations potentially affected by and/or interested in the project. A scoping letter was mailed on February 5, 2001 to potentially affected and/or interested individuals, groups, and agencies, including adjacent landowners, the Benton County Board of Commissioners, Oregon Department of Forestry, Oregon Department of Fish and Wildlife, National Oceanic and Atmospheric Administration (NOAA) Fisheries, U.S. Fish and Wildlife Service, and the Associated Oregon Loggers, Inc. Seven written responses to the scoping letter were received and all public input was filed within the Project Records. The BLM response to the comments received and the EA pages that address those concerns are referenced in Appendix 5 of the EA, List of Scoping Respondents.

2. Comment Period and Comments

The EA was mailed to approximately 10 agencies, individuals and organizations on December 1, 2003. A legal notice was placed in the Corvallis Gazette-Times and the EA and FONSI were posted for public review on the internet during the public comment period from December 1, 2003 to January 9, 2004. Three comment letters were received regarding the EA/FONSI. Responses to these comments can be found in the Scoping section of the South Willie Timber Sale NEPA/EA Analysis File and are also attached as Appendix A to this Decision Record.

3. Consultation /Coordination

In accordance with regulations pursuant to Section 7 of the Endangered Species Act (ESA), the South Willie Timber Sale project was submitted for consultation with the USFWS as part of the *Programmatic Biological Assessment in the North Coast Province for Fiscal Year 2003-2004 Projects Which Would Modify the Habitats of Bald Eagles, Northern Spotted Owls, and Marbled Murrelets*. This consultation was concluded with the USFWS issuing a Biological Opinion (BO; tracking number 1-7-02-F-956, July 24, 2002). The BO determined that the level of any anticipated incidental take is not likely to result in jeopardy to the bald eagle, northern spotted owl, or marbled murrelet.

Also in accordance with Section 7 of the ESA, the South Willie Timber Sale Project was submitted for consultation with the National Oceanic and Atmospheric Administration (NOAA), Fisheries Service in July of 2003. The Letter of Concurrence was received from NOAA Fisheries on August 21, 2003. The Level 1 Team determined that the proposed project is "Not Likely to Adversely Affect" Oregon coast Coho salmon or *Essential Fish Habitat* (*EFH*).

V. <u>Conclusion</u>

I have determined that a change to the Finding of No Significant Impact (FONSI – November 2003) for the South Willie Timber Sale is not necessary for the following reasons:

The existing EA for the South Willie Timber Sale fully describes the project. There are no significant new circumstances or facts relevant to environmental concerns to the

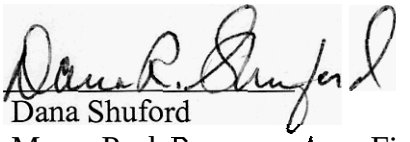
proposed action or its impacts, which were not addressed in the EA. The action is within the scope of the alternatives identified in the original EA and are less than or the same as those anticipated for the proposed action in that assessment.

Protests

In accordance with Forest Management Regulations at 43 CFR 5003.2, the decision for this timber sale will not become effective or be open to formal protest until the Notice of Sale is published "in a newspaper of general circulation in the area where the lands affected by the decision are located." Protests of this sale must be filed within 15 days of the first publication of notice. For this project, the Notice of Sale will be published in the Corvallis Gazette Times on or around April 2,2004 and April 9,2004. The planned sale date is April 28,2004.

Contact Person

For additional information concerning this decision or the BLM protest process, contact Ashley La Forge (503-375-5716), or Carolyn Sands (503-315-5973) at the Marys Peak Resource Area, Salem BLM, 1717 Fabry Rd. SE, Salem, OR 97306.

Approved by:  2-4-04

Dana Shuford — Date

Marys Peak Resource Area Field Manager

Appendix A

Response to Public Comments Received on the South Willie Timber Sale Project

The following are comments that the BLM received from the public during public review of the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI). The comments (in *italics* type) may have been paraphrased for clarity or conciseness, but the complete text of the comment was available to the IDT making the response. The full text of the comment letter is available in the South Willie Timber Sale NEPA/EA Analysis File. The IDT response is in normal type.

Commenter: Oregon Natural Resources Council

Is funding for Projects 2 & 3 available and will these projects be accomplished?

We will look for funding for these projects at the appropriate time, i.e., when the logging is completed. In GFMA timber sales such as South Willie, we are prohibited by BLM regulations from adding "unrelated" projects to the timber sale contract (this is called augmentation of funds) and therefore we have to look for funding from other sources. If deemed appropriate, Projects 2 & 3 of the South Willie Project are expected to be accomplished because they would be done by BLM employees and would take very little time and effort to complete.

We have analyzed similar projects in previous EA's; some of the sales analyzed have been logged, but are still within the timeline recommended for evaluating them (3 to 5 years). If there are any projects of this nature in completed timber sales that have not been completed, please let us know. In most cases, we decide to wait to see if blow down/logging damage has occurred and make sure that trees are wind firm.

While mitigation measures described in the EA can minimize impacts of road construction and reconstruction to soils, they do not eliminate the impacts.

The South Willie Timber sale is located on land designated during the NW forest planning process as GFMA. As such, production of forest products is designated as a primary use of the land. Roads are a necessary and accepted impact of forest management and their impacts do not need to be eliminated completely following forest stand treatment. Roads are made by compacting mineral soil and that is an intentional and desired impact for the specific area to be used for roads. When roads are built the designation we assign to that specific strip of land in our internal Timber Production Capability Classification system is "non-forest". This designation is used so that the acreage is not included in our allowable cut calculations for timber production in the next rotation. The area is still within the forest land base and much of the area immediately adjacent to the roads still produces timber and other vegetative growth. In fact, there are trees growing in the road surfaces on several of the old logging roads in this area.

The EA fails to qualify and quantify the soil recovery following road construction and fails to conduct a soils cumulative effects analysis; thereby it fails to disclose the effects of road construction on soil resources. Under the Cumulative Effects for Soils (EA pg. 10), BLM states "we anticipate…logging activities will continue to locally impact soil resources."

Recovery of roads is difficult to describe and quantify because each site is different and there are no scientific studies dealing with site recovery that have been done on these specific soil types in this general vicinity that can be cited. We do know of, and have observed in many similar locales, places where trees and vegetation reoccupy old road beds, slump and slide areas and similarly disturbed sites. The recovery rates and quality of these sites vary greatly depending on many factors. The preponderance of sites do recover to varying degrees over time. They do not degrade and will re-vegetate. When road surfaces are properly closed or obliterated, using our best management practices, surface erosion and sediment production is minimal to un-measurable. As such, there is no cumulative effect of the proposed action to analyze.

As far as the concern about "logging activities continuing to impact soil resources", the statement continues: "within the watershed on both federal and private lands." In other words, some logging may occur in the future on pieces of land elsewhere in the watershed. Once the proposed logging is completed on this site, no additional logging or road impacts are planned for the foreseeable future in the area being analyzed in this EA. Therefore, there is not a meaningful cumulative impact specific to this site to analyze. For effects on the watershed, please refer to the watershed analysis specific to this area. If you have further questions, you are welcome to contact the Marys Peak Soil Scientist at 503-315-5965.

Is the BLM suggesting that the net result of this project will be to reduce sediment delivery to streams?

As stated in the EA (Chapter III, p. 16): "To the extent that this proposal will influence overall watershed condition, it potentially could result in short term, local increases in stream turbidity during road construction and repair (e.g., will only occur during and immediately after construction and is not likely to be visible or measurable downstream from the project area). These [short-term impacts] would be likely offset by long-term reductions in the supply of fine sediment due to road repairs and upgrading." In response to the concern for fine sediment supply and road use in the watershed, a road sediment assessment was conducted for the South Willie timber sale project, ***Analysis of Road Surface Sediment Production and Delivery to Streams for the South Willy Project: Road Construction and Haul***, to assess the direct, indirect, and cumulative effects of timber haul from this project. This analysis is available upon request from the Salem District Office.

The analysis determined that total sediment yield from all road surfaces (e.g., does not estimate sediment from fill failures and road associated landslides) in the Upper South Fork Alsea watershed is relatively low when compared to individual watershed sediment

yields from published literature (Patric et al. 1987, Pimentel et al. 1987, Reid et al. 1981, Reid & Dunne 1984, Luce et al. 1999, Black & Luce 2001, Luce & Black 1999, Brake et al 1997, among others). Therefore, fine sediment from logging roads is probably not a major source in general in the watershed. Although, the range in sediment yields from road surfaces is large, Luce et. al 1999 also determined that "it may be possible to substantially reduce road erosion by targeting those few sections with the greatest sediment production." Thus, by targeting road segments predicted to be potential sites for erosion, the possibility of sedimentation into streams can be greatly reduced; the South Willie Study predicts that by upgrading target road sections, sedimentation in the watershed could be reduced to as little as 1-3% of total sediment yields in an undisturbed basin. In three cases, existing roads cross streams where the road fill is actively eroding. Resurfacing of these roads with crushed rock, repair of the drainage and fill, plus placement of new 100-year flood design culverts would improve road drainage and fish passage as well as reduce sediment supply at these locations. Therefore, road repairs associated with the proposed action are anticipated to reduce sedimentation rates, over current conditions, in the watershed.

Isn't some of the road repair and upgrading done regardless of logging?

While we strive to fix all of the road related problems within our resource area, we have limited funding for these types of activities. Road repair and upgrading is prioritized and accomplished as funding becomes available. The funds generated from this timber sale will allow us the opportunity to repair/upgrade target roads in the project vicinity in a timelier manner.

New roads will intercept and channelize flow causing long-term impacts to the aquatic environment.

Although all roads can intercept and channelize surface and shallow subsurface flow, to minimize these effects new roads will be located on or near ridgetops, outside of riparian areas and with no stream crossings. As stated in the EA design features (p. 4), "where grades are less than 8% roads would be outsloped without ditches; generally grades over 8% would be constructed with ditches and, depending on gradient, cross drains at intervals not to exceed 400 feet." Any potential flow from the road prism will be redirected into the forest duff and away from streams. Therefore, the roads are unlikely to contribute fine sediment to the stream system, as the riparian reserve and no-cut stream buffers will filter out any sediment that could potentially reach them. Road construction impacts to water quality will be further limited by restricting the work to periods of low rainfall and runoff and construction would employ techniques to reduce the concentration of runoff and sedimentation to a minimum.

Upon project completion, these roads would be blocked to public vehicular traffic and allowed to revegetate, significantly reducing the potential for any persistent erosion from the road surfaces. Studies such as Luce & Black (2001) and Megahan (1974) have noted tremendous decreases in sediment yields within one to three years following disturbance; Luce and Black found that within 1 to 2 years most road plots experienced at least a 50%

reduction in erosion. Consequently, the proposed new road construction is not anticipated to cause significant long-term detrimental impacts to the aquatic environment.

The EA fails to describe the impact of new road construction on the spread and establishment of noxious weeds.

In the South Willie EA, Chapter II page 3 (Design Features), it states: "Where necessary, all exposed mineral soil on ground-based yarding areas, landings, and roads to be constructed would be seeded with Oregon Certified, blue tag, red rescue (*Festuce rubra*) at a rate equal to 40 pounds per acre." Also in Chapter III page 7 it states, "All areas of exposed mineral soil would be sowed with grass seed for erosion and noxious weed control (refer to Vegetation/Botany Report, SWAF, for detailed information regarding the proposed grass seeding). The botany report states that the risk rating for the long-term establishment of noxious weed species and consequences of adverse effects on this project area is low. Below is the noxious weed section (Environmental Consequences) from the Botany Report (SWAF):

> Noxious Weeds: Any ground disturbing activity may lead to an increase in the noxious weeds known from the project area. Known species from the area are priority III noxious weeds and are well established and widespread throughout the Marys Peak Resource Area and the Salem District. Eradication is not practical using any proposed treatment methods. Grass seeding exposed soil areas tends to abate the establishment of noxious weeds. If the contract is not administered correctly and the seed sown is not Oregon certified seed, or the species recommended, the seeding may increase the amount of non-native species in the project area and may lead to a greater infestation of noxious weeds than that anticipated. However, any adverse effects from noxious weeds are not anticipated. The risk rating for the long-term establishment of noxious weed species and consequences of adverse effects on this project area is low.

The BLM does not provide the public with enough information to decide between alternatives.

The decision between alternatives is made by the decision maker, i.e., the field manager. The interdisciplinary team (IDT) analyzes alternatives and, along with the public, recommends an action. Several alternatives were considered by the IDT, but not analyzed because the environmental and/or fiscal consequences of those actions would exceed those of the proposed action (i.e. greater acres treated, larger units, helicopter yarding). All roads and yarding systems of the proposed action have been designed to treat the greatest number of acres needing treatment, while minimizing environmental impacts.

What sections of what units will be accessed with the new road spurs? If shorter road spurs or few road spurs were constructed, how would that effect the number of acres treated? The proposed action contains a large amount of road construction for the amount of acres treated.

Some sale areas require more road construction than other sales; it is a function of topography and logging systems. No new road construction will service the ground-based yarding areas of this sale. Harvest areas which exceeded slope percent guidelines for ground-based yarding were considered for both helicopter yarding and skyline yarding. Helicopter yarding was considered early in the design process to be uneconomical. Skyline yarding remained as the most viable option to harvest the areas that could not be ground-based yarded. Due to the broken topography of these areas, roads had to be built or reconstructed to place a skyline yarder in locations that would optimize both lift and access to proposed harvest areas. Roads were designed to enable a skyline yarder to be positioned in such a manner that yarding corridors would be perpendicular (as much as possible) to the slope, which lessens impacts to the soil and minimizes impacts to residual stands.

This sale is located in GFMA, and an attempt was made to treat as much area as economically possible. Road work, whether new construction, reconstruction, or improvement, is a direct cost against the stumpage value of the timber sale. As a government agency, we have an obligation to the taxpayers to design timber sales in the GFMA that are economically feasible. The costs of road work are weighed against projected volume removal, while trying to address environmental concerns of the specialists comprising the timber sale Interdisciplinary Team (IDT). Road work is not proposed on timber sale areas for convenience. Considerable effort is made to minimize road densities.

Old, overgrown roads which are vegetated and stable should not be reopened and ripped for decommissioning.

Chapter II (p. 17) of the EA states: "Many older overgrown roads are vegetated and stable with no culverts; they are not rerouting surface water. These roads would not be disturbed and would be considered closed/decommissioned upon project completion." There is no proposal to reopen these roads or to rip the road surface. These roads will be left alone to naturally revegetate.

The agency should not be managing for peak growth rates of commercial tree species.

The project area lies within lands designated as General Forest Management Area (Matrix) and Riparian Reserve as shown in the Northwest Forest Plan and the RMP. These documents were widely circulated in the state of Oregon and elsewhere, and public review and comment were requested at each step of the planning process. As stated in the RMP, an objective of Matrix lands is to "produce a sustainable supply of timber and other forest commodities to provide jobs and contribute to community stability" (p. 20). The third objective under Timber Resources page 46 of the ROD states "Manage timber stands

to reduce the risk of loss from fires, animals, insects, and diseases." To not treat forest disease (Dwarf Mistletoe) where possible is not reaching these objectives.

Mistletoe is a natural component of forest function. The proposed treatment of mistletoe will be ineffective….learn to live with mistletoe in this infected area. Clear cuts are ecologically unacceptable, especially in the riparian reserves, where the South Willie project focuses its mistletoe control.

The BLM agrees that Mistletoe is a naturally occurring infection and eradication is neither practical nor desirable. Trees infected with Dwarf Mistletoe provide habitat for botanical and wildlife species. From a purely botanical stand point, Dwarf Mistletoe is not a concern within the South Willie Project area or within the Marys Peak Resource Area (it appears to be relatively uncommon Western Oregon-wide). However, in an area designated primarily for timber production (GFMA), it is favorable to treat the Dwarf Mistlertoe, which reduces the grade of lumber, slows conifer growth rates and may result in dead or dying trees. Weaken trees often invite other parasites within the stand. The proposed silvicultural prescription was not designed to eradicate the mistletoe infection, but to help control its spread, especially to understory hemlocks.

Although there are many references on mistletoe infection, research in Ponderosa Pine forest and the Sierra Nevada are not likely to be relevant to the South Willie project area. The proposed sivicultural prescription to treat mistletoe infection was developed primarily from information through consultation with the Forest Service Westside Center for Forest Protection in Sandy, Oregon (among other sources including the USDA Agricultural Handbook 709). In addition to our research, a vegetation pathologist from the Westside Service Center for the USDA Forest Health Protection visited the South Willie project area on April 2, 2001 accompanied by a Marys Peak silviculturalist. The pathologist provided information and recommendation for treatment of the disease in the project area. The prescription developed for this sale provides management action recommended for western hemlock mistletoe infection by the Westside Service Center for Forest Protection and in the Forest Disease Management notes by the Forest Service Pacific Northwest Region.

Approximately 21 acres (six percent) of the total 157 acres of the timber sale have been designated as special mark area to reduce the spread of Dwarf Mistletoe from a moderately infected area along the south edge of the thinning area to a light / not infected area to the north. The special mark includes removing or girdling infected western hemlock trees and leaving resistant Douglas-fir trees. With the removal of infected and host trees and the reserving of non-host trees, the mistletoe is unlikely to spread to the generally uninfected western hemlock trees to the north. The approximately 30 acres of mistletoe-infected area south of the sale area should adequately provide stand diversity and habitat for wildlife. Waiting a hundred years plus for natural fire regime to eradicate mistletoe infection is not good management.

BLM removed large areas of Riparian Reserves from the timber sale specifically because of the large amounts of western hemlock in those areas which would have been removed

for mistletoe control. There are approximately 2 acres of Riparian Reserve within the mistletoe control special mark area that were left in the sale specifically because they contained few hemlocks and would not be heavily cut. We also specified that we would cut few hemlocks over 24" DBH anywhere in the Riparian Reserves, leaving many infected trees. No regeneration harvests (clear cuts) are proposed in this sale.

Commenter: Kelly Hockema

Will you be using "Bio" bags or silt fencing on any of this project?

The EA (Chapter II, p. 4) states: "On all roads during periods of high rainfall, the Authorized Officer may restrict log hauling to minimize water quality impacts, especially if sediment transport is imminent. Silt fences and straw bales or other sediment control devices would be installed if necessary to control sediment transport." Additionally, the contractor would be required to take measures necessary to control sediment in the project area.

Will the placement of logs enhance "overwintering" habitat for Coho?

Because the project area is above Alsea Falls, a natural barrier to anadromous fish, the placement of logs into the selected perennial stream would not affect Coho habitat. Project 3 was proposed because the selected stream is lacking large wood and structure. Placing logs into the stream would benefit cutthroat trout, water quality, and help to restore channel function by holding back sediment. The small number and size of trees being felled from an overstocked riparian area would cause very little disturbance. Largely, the project would provide some structure in the stream channel until riparian areas can mature and produce/supply large wood naturally.

I recently walked upper Green River.... and was not impressed by the total overkill of export quality Douglass Fir placed in stream. What will happen in 2 or 3 events in winter and stream course change making logs placed by helicopters irrelevant, plus the introduction of sod & silt in prime Coho spawning ground.

This project was conducted by the Forest Service and the Mid Coast Watershed Council. Projects like these will continue all over the coast due to the lack of large woody debris in streams. Most streams are lacking sufficient wood from stream cleaning, harvest of riparian trees, and agricultural clearing, leaving very little potential for future large wood recruitment. These projects are trying to imitate what streams might have had naturally as far as stream structure. If these log structures change the streams' course, providing more sinuosity, cover and backwater habitat, then it can be considered a success for fish and over wintering habitat. The introduction of silt and sod from bank scouring is a natural consequence of newly recruited wood, no matter how it gets there. In the end, some bank scouring is considered worth the increase in quality fish habitat (including over-wintering habitat).

Nature will survive without government.

The BLM is mandated by law to manage public lands within our District boundaries. The South Willie EA analyzed a "No Action" alternative, which would allow for nature to continue to shape the landscape without management. However, the interdisciplinary team did not recommend this alternative, as it does not meet goals and objectives outlined in our District Resource Management Plan (RMP) or the purpose and need of the proposed project as described in the EA on page 7.

Talk about the management of the BLM's 2nd growth and old growth stands.

As stated in the EA on page 18, the proposed project area is within "…young managed stands, approximately 50 years old, logged in the 1950's…", which makes it 2nd growth and there is no old growth within the project area. All recently proposed BLM projects have been in 2nd growth timber stands. We rarely manage old growth stands.

Us little guys love to work and produce; get us some projects coming!

Marys Peak Resource area attempts to make available projects/contracts to small sale purchasers. Recently, we have not offered the small salvage sales we typically negotiate to small operators because (1) we have not had significant amounts of blowdown in the resource area during the past 4 years and (2) the smaller salvage has been reserved for fish habitat restoration projects.

Commenter: Starker Forests

We are happy to see a proposal to construct new roads, open existing old roads, and use existing truck routes to remove timber products…we see significant potential benefits for recreation, fire protection, and the local economy.

We appreciate your comment in support of the proposed action.